

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

**BEVERLY B. MARTIN, as next friend  
of KHALID MOUTON,**

*Plaintiff,*

vs.

**AHMED HOLT, et al.,**

*Defendants.*

**CIVIL ACTION NO.  
5:23-cv-00004-MTT-CHW**

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**DEFENDANTS MOTION TO DISMISS**

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Defendants Ahmed Holt, Robert Toole, Stan Shepard, Jack Sauls, Sharon Lewis, Trevonza Bobbitt, Michael Anderson, Josh Wicker, Deidra Edwards, Juanita Sharpe, Chad Putnam, Joseph Hall, Shayla McClain, Barnard Florence, Cierra Harper, Jessica Howard, Carl Anderson, Marjorie Glover, Cory Osborne, Heather Flowers, Angela Howell, and Kenneth Scott, by and through counsel, the Attorney General for the State of Georgia, file this Motion to Dismiss Plaintiff's Complaint. The basis for this motion is set forth in more detail in the accompanying brief in support.

Respectfully submitted this 13th day of March, 2023.

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/s/ Ellen Cusimano  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this day, filed the foregoing document with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

This 13th day of March, 2023.

*/s/ Ellen Cusimano*  
ELLEN CUSIMANO 844964  
Assistant Attorney General

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